ANN BAVENDER* JOHN C. BUTCHER* HARRY F. COLE ANNE GOODWIN CRUMP VINCENT J. CURTIS, JR. PAUL J. FELDMAN FRANK R. JAZZO M. SCOTT JOHNSON* MITCHELL LAZARUS STEPHEN T. LOVELADY SUSAN A. MARSHALL HARRY C. MARTIN ALISON J. MILLER LEE G. PETRO RAYMOND J. QUIANZON MICHAEL W. BICHARDS JAMES P. RILEY KATHLEEN VICTORY HOWARD M. WEISS

*NOT ADMITTED IN VIRGINIA

FLETCHER, HEALD & HILDRETH, P.L.C.

ATTORNEYS AT LAW

11th FLOOR, 1300 NORTH 17th STREET

ARLINGTON, VIRGINIA 22209-3801

OFFICE: (703) 812-0400 FAX: (703) 812-0486 www.fhhlaw.com RETIRED MEMBERS RICHARD HILDRETH GEORGE PETRUTSAS

CONSULTANT FOR INTERNATIONAL AND INTERGOVERNMENTAL AFFAIRS SHELDON J. KRYS U. S. AMBASSADOR (ret.)

OF COUNSEL
DONALD J. EVANS
FRANCISCO R. MONTERO
EDWARD S. O'NEILL*
ROBERT M. GURSS*
EUGENE M. LAWSON, JR.

WRITER'S DIRECT

703-812-0426 crumb@fhhlaw.com

June 23, 2005

BY ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Esquire Secretary Federal Communications Commission 445 12th Street, S.W., Room TW-B204 Washington, D.C. 20554

Attention: Video Division, Media Bureau

Re: MB Docket 03-15

Request for Extension of Digital Replication Deadline Request for Extension of Special Temporary Authority

WGMB-DT, Facility ID No. 24976

Baton Rouge, Louisiana

Dear Ms. Dortch:

This request is being submitted on behalf of ComCorp of Baton Rouge License Corp. ("ComCorp"), licensee of WGMB(TV) and permittee of WGMB-DT, Baton Rouge, Louisiana. On June 14, 2005, prior to the Commission's release of its *Public Notice, DTV Channel Election Issues - Compliance with the July 1, 2005 Replication/Maximization Interference Protection Deadline; Stations Seeking Extension of the Deadline*, DA 05-1636, released June 15, 2005, ComCorp submitted a request for extension of the digital replication deadline. A copy of that request is attached hereto and incorporated herein. This request is being resubmitted at this time in order to comply with the procedures outlined in the June 15, 2005, *Public Notice* and to further update the previously filed request.

As indicated in the attached request filed June 14, 2005, ComCorp anticipates that the DTV facilities for WGMB-DT as authorized in its outstanding construction permit can be completed within one month of the July 1, 2005 interference protection deadline. It is seeking a waiver and extension of that deadline for a period of three months in order to allow for any currently unanticipated difficulties which might arise, such as weather issues and the like.

As set forth in the attached June 14 request, the need for an extension of time results from delays in the delivery of the DTV antenna and transmitter. As detailed therein, although the orders for the equipment were placed some months ago, there have been delays in the delivery of

the equipment which have precluded its installation. Attached hereto are updated letters from Electronics Research, Inc. ("ERI"), the antenna manufacturer, and Acrodyne Industries, Inc., the transmitter manufacturer. These letters indicate that the anticipated delivery date for the antenna will now be July 16, 2005, and the anticipated delivery date for the transmitter will be July 5, 2005.

As further described in the attached June 14 request, delays in receiving approval from the tower owner for a co-located station's proposed facility created additional delays for WGMB-DT. Prior to receiving word from the tower owner that installation of the proposed antennas for the two stations would not be approved due to loading concerns, ERI had started manufacturing the WGMB-DT antenna, but this process had to be stopped to address the tower owner's concerns. Once the redesigned antenna was approved, ComCorp was able to direct ERI to proceed to complete the antenna with the new specifications, but the delays caused by the tower owner in turn caused this project to lose its place in line so that it was placed behind other orders, thereby adding to the delays in delivery.

In addition, the shifting schedules further hampered the already limited availability of tower and transmitter installation crews. ComCorp now has antenna and transmitter installation crews solely dedicated to completion of the construction of the WGMB-DT facilities and those of co-owned stations in back-to-back schedules, subject to delivery of the necessary equipment as anticipated. No further delays are currently expected, although it is possible that antenna installation could be impaired if inclement weather should arise at the time of antenna delivery. ComCorp continues to anticipate that it will be able to complete construction of its authorized DTV facilities within one month of the interference protection deadline. The difficulties which will prevent completion of those facilities prior to July 1, 2005 are matters that are clearly beyond the control of ComCorp. Given that fact, and the limited nature of the extension requested, grant of this request clearly would serve the public interest.

In addition, ComCorp hereby respectfully requests extension of its currently outstanding Special Temporary Authority ("STA") for reduced-power DTV operation, File No. BDSTA-20031015AHJ, as most recently extended by File No. BEDSTA-20050328AVI, granted June 2, 2005.

Should any questions arise concerning this matter, please communicate with this office.

Very truly yours,

Anne Goodwin Crump

Counsel for

ComCorp of Baton Rouge License Corp.

Enclosures

cc: Mr. Shaun Maher By Hand Delivery and E-Mail (Shaun.Maher@fcc.gov)

17 June 2005

Marsand, Inc. 6100 IH-35W PO Box 485 Alvarado, TX 76009

Dear Mr. Sanderford,

The purpose of this letter is to confirm the new shipping dates for Marsand, Inc. We experienced delays in both the manufacturing and tuning of your antennas. We realize that you time constraints to be on-air by July 1st of this year, but regret to inform you that the ship dates are as follows:

Station	Delivery
CH 44/45 Evansville, IN (WEVV) CH 33/34 Baton Rouge, LA (WVLA)	June 27, 2005 July 14, 2005
CH 44/45 Baton Rouge, LA (WGMB)	July 16, 2005

We will do the best we can to expedite these shipments.

Sincerely,

Shawn Knotts Project Manager Antenna Division Acrodyne Industries, Inc.



Corporate Headquarters 10706 Beaver Dam Road Cockeysville, MD 21030 888.881.4447 f: 410.568.1546

Manufacturing Facility 200 Schell Lane Phoenixville, PA 19460 800.523-2596 f: 610-917-8148

www.acrodyne.com

June 17, 2005

Mr. Matthew A. Sanderford, Jr.,P.E. Marsand, Inc.-President P.O. Box 485 Alvarado, TX 76009 Phone: 817-783-5566

Fax: 817-783-5577

Dear Mr. Sanderford,

This is to confirm the shipping and deliver date of the QXD1 UHF DTV transmitter that you purchased for WGMB-DT and we are manufacturing on Acrodyne sales order number 25105 are as followings:

Shipping Date: June 28, 2005 Deliver Date: July 5, 2005

If I can be of any assistance in the future please call or fax.

Best Regards,
Daniel Traynor,
Director of Contracts

AND RETURN
THIS COPY TO

ANN BAVENDER JOHN C. BUTCHER* HARRY F COLF ANNE GOODWIN CRUMP VINCENT J. CURTIS, JR. PAUL J. FELDMAN FRANK R. JAZZO M. SCOTT JOHNSON MITCHELL LAZARUS STEPHEN T. LOVELADY SUSAN A. MARSHALL HARRY C. MARTIN ALISON J. MILLER LEE G. PETRO* RAYMOND J. QUIANZON MICHAEL W. RICHARDS* JAMES P. RILEY KATHLEEN VICTORY HOWARD M. WEISS

NOT ADMITTED IN VIRGINIA

FLETCHER, HEALD & HILDRETHTCHER, HEALD & HILDRETH DECEMBER PETRUTSAS

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ROBERT M. GURSS*
EUGENE M. LAWSON, JR.

WRITER'S DIRECT

703-812-0426 crump@fhhlaw.com

June 14, 2005

RECEIVED

Marlene H. Dortch, Esquire Secretary Federal Communications Commission 445 12th Street, S.W., Room TW-B204 Washington, D.C. 20554

JUN 1 4 2005

Federal Communications Commission Office of Secretary

Attention: Video Division, Media Bureau

Re:

Request for Extension of Digital Replication Deadline

WGMB-DT, Facility ID No. 24976

Baton Rouge, Louisiana

Dear Ms. Dortch:

ComCorp of Baton Rouge License Corp. ("ComCorp"), licensee of WGMB(TV) and permittee of WGMB-DT, Baton Rouge, Louisiana, hereby respectfully requests a waiver and three-month extension of the July 1, 2005, deadline by which stations that are affiliated with one of the top four networks in the top 100 markets and that receive a tentative digital channel designation on their current digital channel in the channel election process must construct full, authorized facilities or lose interference protection ("Replication Deadline"). ComCorp actually anticipates at this time that it will be able to complete construction of its authorized facilities and commence operations by July 31, 2005, but it is seeking a three-month extension out of an abundance of caution.

ComCorp has been working diligently toward meeting the Replication Deadline since it was announced less than a year ago, and it has made substantial progress in its efforts. As set forth more fully below, the digital antenna was ordered in November, 2004, and the digital transmitter was ordered in January, 2005. All necessary equipment to commence full-power operations has been ordered, and it is 90 percent paid for. Delays beyond the control of ComCorp have intervened, however, to slow the delivery and installation of the antennas and transmitters. While it had been hoped until quite recently that WGMB-DT would still be able to meet the July 1 Replication Deadline, it has now become clear that a few additional weeks will be required.

Marlene H. Dortch, Esquire June 14, 2005 Page 2

Some of the delay has resulted from the complications of needing to schedule multiple antenna and transmitter installations. ComCorp, through an intervening parent company, is a subsidiary of ComCorp Broadcasting, Inc., and ultimately of Communications Corporation of America ("CCA"). ComCorp Broadcasting, Inc. and CCA are parent companies of the licensees of a total of nine full-power television stations, six of which have a July 1, 2005, Replication Deadline. These stations include WEVV-DT, Evansville, Indiana; KWKT-DT, Waco, Texas; KTSM-DT, El Paso, Texas; KVEO-DT, Brownsville, Texas; and KMSS-DT, Shreveport, Louisiana, in addition to WGMB-DT. For four of these stations, the necessary installations have already been completed or will be completed shortly, and those stations will meet the Replication Deadline. Only two of the stations, WEVV-DT and WGMB-DT, will be unable to meet the Replication Deadline, but it is anticipated that both of those stations will be able to commence full-power DTV operations within one month of the Replication Deadline.

It should be noted that all of the stations licensed to CCA subsidiaries are located in small markets, all the way down to Market 100, the smallest market required to meet the Replication Deadline, and five of the six stations are located within the smallest nine markets involved. Specifically, the markets involved are ranked as Nielsen DMA numbers 81 (KMSS-DT), 93 (KVEO-DT), 95 (KWKT-DT), 96 (WGMB-DT), 99 (WEVV-DT), and 100 (KTSM-DT). Further, these stations, including WGMB-DT, were previously granted extensions of their DTV construction permits based in part upon financial hardship. (For WGMB-DT, see File No. BEPCDT-20020930AAQ). Thus, moving forward with the DTV transition has been difficult and taxing for WGMB-DT and its sister stations. Nonetheless, WGMB-DT was able to begin digital broadcasting at reduced power pursuant to Special Temporary Authority on October 31, 2003, and it has been broadcasting in this manner since that time.

Full-power digital transmitters for all of the stations facing the Replication Deadline were ordered from Acrodyne-Ai, Inc. on January 24, 2005, and a downpayment of 30 percent of the cost was sent by overnight mail that day. A copy of the purchase order for the transmitter is attached hereto. An additional 60 percent payment from CCA was sent by wire transfer on January 25, 2005. Generally, the estimated availability for shipping is 90 days after placement of the order, with an additional estimated shipping time of seven days. The transmitter installations were all scheduled back-to-back for each station. The first transmitter, however, was not delivered to KTSM-DT until the first week of May. Each installation requires approximately two weeks. ComCorp has been working with Acrodyne to attempt to accelerate the delivery schedule. Until approximately mid-May, it was hopeful that the schedule could be moved up enough to allow WGMB-DT to meet the Replication Deadline, but at that time it became clear that the schedules were not moving any further.

Marlene H. Dortch, Esquire June 14, 2005 Page 3

Additional delays with the WGMB-DT transmitter arose because of environmental issues with an underground diesel tank at the transmitter site. Further, there was an added complication caused when the local electric power company determined that the entire site, which is also shared with WVLA(TV), Baton Rouge, Louisiana, needed to have the electrical system updated. This process may cause some further delays, but they are not anticipated at this time. It is currently anticipated that the transmitter will be delivered by June 30, 2005, and that installation will be complete on or about July 20, 2005. The station will then immediately begin full-power operation.

As a separate matter, a sidemount digital antenna was ordered from ERI, with a downpayment of 30 percent, on November 22, 2004. A copy of the purchase order for this antenna is attached hereto. Installation of the antenna is expected to be complete by June 28, 2005. This installation date represents a delayed delivery and installation due to two separate issues.

One related to the proposed facilities for WVLA-DT, which is to be located on the same tower. For that station, issues concerning antenna loading arose with the tower owner, Global Tower Systems. Structural questions regarding the top mount antenna equivalency were raised, and Global required structural studies to be completed. After some delay in the study, upon completion, the mechanical parameters of the initial antenna were rejected. A re-design and reconfiguration of the antenna was then required, and the modified antenna was not finally approved by Global until May 12, 2005. While this process involved another station, installation for both stations was delayed pending resolution of the structural issues.

The second issue resulted from a delay in the ability to install the antenna for sister station KWKT-DT. As with the transmitter installations, the antenna installations are scheduled back-to-back. For KWKT-DT, it was necessary for the tower owner, Global Tower Systems, to reinforce the tower before the DTV antenna could be installed. Because it was necessary to wait for this work to be completed, the installation schedule for all of the remaining antennas was pushed back approximately two weeks. This lost time clearly added to the difficulties of completing all construction prior to the Replication Deadline.

As an additional matter, because of the many stations attempting to meet the Replication Deadline within a short timeframe, tower crews and transmitter installation crews are in high demand, and their availability is scarce and at a premium. As a result, licensees are unable to hire additional crews to man multiple projects simultaneously. Rather, they are effectively locked into continuing with only the crews that they have available at this time and to proceeding as quickly as possible with them.

FLETCHER, HEALD & HILDRETH, P.L.C.

Marlene H. Dortch, Esquire June 14, 2005 Page 4

ComCorp intends to continue to move forward as quickly and diligently as possible. As indicated above, its current schedule calls for construction to be complete and full-power operation to begin as of July 20, 2005, and in any event prior to August 1, 2005. Under the circumstances, and given the brief amount of time involved, a short extension of the Replication Deadline would serve the public interest. ComCorp is requesting an extension of time beyond its planned completion date only to provide for any unforeseen difficulties which might cause a temporary interruption in the tight schedule outlined above.

Should any questions arise concerning this matter, please communicate with this office.

Very truly yours,

Anne Goodwin Crump

Counsel for

ComCorp of Baton Rouge License Corp.

DECLARATION

I, D. Wayne Elmore, hereby declare and state as follows:

I am President of ComCorp of Baton Rouge License Corp. I have read the foregoing request for extension of the July 1, 2005, deadline by which stations that are affiliated with one of the top four networks in the top 100 markets and that receive a tentative digital channel designation on their current digital channel in the channel election process must construct full, authorized facilities or lose interference protection.

I hereby declare under penalty of perjury that the facts contained therein are true and correct to the best of my knowledge and belief.

Executed this 14th day of June, 2005.

D. Wayne Elmore

President, ComCorp of Baton Rouge License Corp.

*

Marsand, inc.

Purchase Order

Matthew A. Sanderford, Jr., P.E.

P.O. Box 485 6100 IH-35W Alvarado, TX 76009

(817)783-5566 Phone (817)783-5577 Fax

Date	Number
1/18/2005	2981

	· Vendor
- 1	Acrodyne Ai, Inc. P.O. Box 808
	200 Schell Lane Phoenixville, PA 19460

Ship To
WVLA Transmitter Site Addis, LA Call Terry Freeman for Delivery: (225) 931-9281

	Reference	Terms	Due Date	Ship Via
	Marsand/WGMB	Net 30	2/17/2005	
	Iviaisaliw w Givib		ļ	
Description		Qty	Rate	Amount
OQXD1 30 kW IOT DTV xmtr, Ch 45 with ERI DTV mask that and/Blasetti xmtr upgrade schedule	filter/combiner as per	1	357,200.00	357,200.0
	:			
			.	
		•		
0% downpayment to follow with hard copy of PO via USPS		Total	1	

Marsand, inc.

Purchase Order

Matthew A. Sanderford, Jr., P.E.

P.O. Box 485 6100 IH-35W Alvarado, TX 76009

(817)783-5566 Phone (817)783-5577 Fax

Date	Number
11/22/2004	2967

Vendor	
ERI 7777 Gardner Rd. Chandler, IN 47610	

Ship To WGMB CH 44 Transmitter Site
Call before delivery! 59270 Hwy 1148 Addis, LA 70809

	Reference	Т	erms	Due Date	Ship Via
		30/3	0/30/10	11/22/2004	
Description			Qty	Rate	Amount
ERI ATW30H5-HSC4L-44H per Quote DLZ4102701-TR Shipping to be added			1	143,375.00	143,375.00
			Total	<u> </u>	\$143,375.00

CERTIFICATION FOR FEDERAL BENEFITS

The undersigned hereby certifies that no officer, director, or person holding a five percent (5%) or greater interest in ComCorp of Baton Rouge License Corp. is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853a.

COMCORP OF BATON ROUGE LICENSE CORP.

Date: <u>June 22, 2005</u>	By: D. Wan Elna
	Name:D. Wayne Elmore
	Title: CEO